

Andrew J. Ungberg (admitted *pro hac vice*)
FRANKFURT KURNIT KLEIN & SELZ PC
488 Madison Avenue, 10th Floor
New York, New York 10022
Tel: (212) 908-0120
Fax: (212) 593-9175
aungberg@fkks.com

Kimberley R. McGhee (No. 009728)
LAW OFFICES OF KIMBERLEY R. MCGHEE, P.C.
8880 W. Sunset Rd., Ste. 250
Las Vegas, NV 891483
Tel: (702) 423-9491
kmcghee@kmcgheelaw.com

Attorneys for Defendant Stephen D. Chakwin, Jr.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PREFERRED CAPITAL
LENDING, INC., an Illinois
Corporation; and PREFERRED
CAPITAL LENDING OF
NEVADA, LLC, a Nevada Limited
Liability Company,

Plaintiffs,

vs.

STEPHEN D. CHAKWIN, JR., an
Individual; DOES I through X
inclusive; ROE BUSINESS
ENTITY XI through XX, inclusive,

Defendants.

Case No.: 2:13-CV-00368-GMN-NJK

NEW HEARING DATE/TIME:

Thursday, September 25, 2014 at 1:30 p.m.
Courtroom 7D before The Honorable
Gloria M. Navarro, Chief Judge,
United States District Court

STIPULATED APPLICATION TO CONTINUE ORAL ARGUMENT

(First Request) **AND ORDER**

Plaintiffs Preferred Capital Lending, Inc. and Preferred Capital Lending of
Nevada, LLC (together "PCL") and Defendant Stephen D. Chakwin, by and
through their undersigned attorneys, hereby stipulate and agree as follows:

1 WHEREAS, on September 27, 2013, PCL filed a "Motion for Summary
2 Judgment on Plaintiffs' First and Second Causes of Action" [ECF No. 26];

3 WHEREAS, on October 28, 2013, Mr. Chakwin filed a "Cross Motion for
4 Summary Judgment" [ECF No. 31];

5 WHEREAS, on August 29, 2014, this Court entered an order setting oral
6 argument on the above-referenced motions for September 18, 2014;

7 WHEREAS, Mr. Chawkwins' undersigned counsel is unavailable on this
8 date because counsel will be on trial in another matter from September 16 through
9 and including September 23, 2014; and

10 WHEREAS, the Parties have conferred regarding their respective schedules
11 and believe there is good cause for a brief continuance of oral argument;

12 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED,
13 subject to the approval of the Court that:

14 1. The oral argument currently scheduled for September 18, 2014 shall
15 be continued until **September 25, 2014, at the hour of 1:30 p.m. in Courtroom 7D.**

16 DATED: September ¹⁰ 10, 2014
17 New York, New York

18 FRANKFURT KURNIT KLEIN & SELZ PC

19 By: 
20 Andrew J. Ungberg

21 488 Madison Avenue, 10th Floor
22 New York, New York 10022
23 Tel: (212) 908-0120
24 Fax: (212) 593-9175
25 Aungberg@fkks.com

26 *Attorneys for Defendant Stephen D. Chakwin, Jr.*

- and -

Kimberly R. McGhee, Esq.
8880 W. Sunset Rd., Ste. 250
Las Vegas, NV 89148
702-423-3491 Tel
702-253-7565 Fax
Kmcghee@kmcgheelaw.com

27 **IT IS SO ORDERED.**

28 
Gloria M. Navarro, Chief Judge
United States District Court

DATED: 09/11/2014

1 DATED: September __, 2014
2 Las Vegas, Nevada

3 CLAGGET & SYKES LAW FIRM

4 By 

5 Matthew S. Granda

6 8751 W. Charleston Blvd., Suite 220
7 Las Vegas, NV 89117
8 Tel: (702) 655-2346
9 Fax: (702) 655-3763
10 mgranda@claggettlaw.com

11 *Attorneys for Plaintiffs Preferred Capital*
12 *Lending, Inc. and Preferred Capital*
13 *Lending of Nevada, LLC*
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28